

Comments

EPA: None

State: None

Company: See attached letter dated March 3, 2011



associated electric cooperative, inc.

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March 3, 2011

Mr. Stephen Hoffman  
Office of Resource Conservation and  
Recovery (5304P)  
U.S. Environmental Protection Agency  
2733 South Crystal Drive, Fifth Floor  
Arlington, VA 22202

Dear Mr. Hoffman:

RE: Draft Dam Safety Inspection Report for AECI New Madrid Power Plant

Associated Electric Cooperative, Inc. (AECI) received a draft report regarding the Thomas Hill and New Madrid coal combustion byproduct storage units. GEI Consultants completed the Thomas Hill evaluation, and GZA GeoEnvironmental, Inc. completed the New Madrid evaluation.

The Thomas Hill facility received a "satisfactory" and New Madrid a "Fair" rating. It is our understanding that this rating pertains to the potential consequences of a failure and not the likelihood of a failure event. Furthermore, we agree with the conclusions that no indications were given in either draft report of slope stability issues leading to impoundment failure.

AECI is satisfied with the content and conclusions of the Thomas Hill draft report with the exception of Item 12.1 which states: "A preliminary analysis of static and seismic slope stability and liquefaction potential of the slag dewatering basin impoundment should be completed to determine whether more detailed seismic studies are necessary." There are no mapped quaternary or younger faults within the vicinity of the Thomas Hill facility. The only active seismic zone in the state of Missouri is located over 300 miles from the plant. Furthermore, Thomas Hill does not fall within the United States Geologic Survey mapped zone of minimum or maximum peak ground acceleration and, based on the site-specific stratigraphy, there is no potential for liquefaction.

Our only comment for the New Madrid report is related to Section 3.2, Item #10. The section recommends that New Madrid acquire the complete copies of the

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impoundment design and construction documentation from the designing engineers. The original drawings are not available for the older impoundment facilities. In 2009, AECl contracted with a geotechnical firm to complete a global stability analysis of the impoundment which provided specific information on how the embankments were constructed and an integrity rating. During that evaluation, we attempted to find the original design drawings and have determined they do not exist. It is our opinion and the opinion of our geotechnical consultant that the information collected from the global stability analysis provides adequate information pertaining to the stability and construction techniques used to build the embankments given that drawings for the embankments are not available.

Thank you for this opportunity to comment, and please direct any future correspondence on this issue to my attention.

Sincerely,



Brent Ross, Manager  
Environmental, Health & Safety

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